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Tuesday, June 14, 2022

VIA ECF & VIA EMAIL

Honorable District Judge John P. Cronan
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Courtroom 20C
New York, New York 10007-1312

Re: Kaye v. Health and Hospitals Corporation et. al.
18-CV-12137(JPC)(JLC)

Dear Honorable District Judge Cronan:

In advance of the parties' scheduled Conference on June 29, 2022, I respectfully write the Court to seek leave to file an application to withdraw as counsel pursuant to Local Rule 1.4 on or by June 21, 2022. I seek to withdraw on the following bases: 1.16(a) and 1.16(b)(3)-(5) of the Model Rules of Professional Conduct. Due to the nature of the disputes involved, I am seeking to file a charging lien and a pendant action in quantum meruit. Fellah v. City Univ. of New York, 20-cv-6423, 2020 U.S. Dist. LEXIS 263411; see also Villar v. City of New York, 546 F. Supp. 3d 280 (S.D.N.Y. July 1, 2021). Although, I sought confirmation from Plaintiff yesterday afternoon, to the extent that I am aware of, she should have all of the discovery produced in this matter. To the extent that she doesn't, I also seek leave of the court to file a retaining lien.

Respectfully submitted,

/s/

Special Hagan, Esq.
Attorney for Melissa Kaye, MD

Cc: Donna Canfield, Esq.
Counsel for Defendants